ROB SALTZMAN, ESQUIRE PLUESE, BECKER & SALTZMAN, LLC

Attorneys At Law RS1765

20000 Horizon Way, Suite 900

Mt. Laurel, New Jersey 08054-4318

telephone: (856) 813-1700 telecopier: (856) 813-1720 e-mail: rsaltzman@pbslaw.org Attorneys for the Mortgagee

File No. 104265B

In re:

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

CASE NO. 20-17570-MBK

CHAPTER 13

Jeremy R Askew Lisa J Burke-Askew

CERTIFICATION OF MORTGAGEE

POST-PETITION DEFAULT

I, Clina Miner	, certify as follows:
	, certify as follows.

- 1. I am an authorized representative of Cenlar FSB, servicer for the Mortgagee, New Jersey Housing and Mortgage Finance Agency, holder of a first purchase money mortgage on the property of the Debtors located at 116 8th Ave, Roebling, New Jersey 08554, and I am familiar with the within matter. In the event the Automatic Stay in this case is modified, this case is dismissed or converted and/or the Debtor(s) obtain(s) a discharge and a foreclosure action is commenced, a foreclosure will be conducted in the name of Movant's successor or assignee.
  - 2. The instant Petition of Debtors was filed on June 16, 2020.

3. a. The regular monthly mortgage payment, including taxes and insurance,

July 01, 2020 is:

\$1,078.72

b. The regular monthly mortgage payment, including taxes and insurance,

December 01, 2020 is:

\$1,077.53

4. No payments have been received to the Mortgagee's knowledge as of the date hereof.

5. Foreclosure proceedings had commenced when the instant petition in bankruptcy was filed, captioned New Jersey Housing and Mortgage Finance Agency v. Jeremy Askew, et al. Docket No. F-003259-20. At the time of the filing of Debtors' instant Petition, the status of Movant's Foreclosure action was as follows: Complaint has been filed.

6. Debtors should have made 8 payments outside the plan since the instant Petition was filed.

7. Since the date of filing, Debtors have made no payments. Attached is an itemization of each regular mortgage payment by date, amount and mode of payment, as indicated by the Mortgagee's records as of the date hereof, if applicable. Inquiries regarding the number, date, amount and application of payments may be made to the Mortgagee's local counsel identified at the top of the first page of this Certification, or the Mortgagee and, upon request, an itemization will be timely provided.

Debtors are in arrears 8 months' payments outside the plan, through the payment due February 01, 2021.

9. The total amount of delinquency outside the plan is \$8,626.19. This amount is computed in the following manner:

Total pymt./mo. (\$1,078.72) X No. mos. in arrears (5)

Total pymt./mo. (\$1,077.53) X No. mos. in arrears (3)

Further, it is likely that another regular monthly post-Petition payment will come due by the time of the anticipated date for disposition of the this application. Accordingly, the amount due as of the presently anticipated hearing date is projected to be \$9,703.72.

10. The information contained in this Certification is current as to payments received on or before the date of execution of Certification. Inquiries regarding the number, date, amount and application of payments may be made to the Mortgagee's local counsel or the Mortgagee. The information contained in the foregoing paragraphs relate only to the Mortgagee's allegation of post-Petition default "outside" the Chapter 13 Plan. Information regarding Mortgagee's allowed Secured Claim, representing the pre-Petition mortgage default to be cured "inside" the Chapter 13 Plan, may be obtained from examination of the Mortgagee's filed Proof of Claim which is available from the Bankruptcy Court Clerk's office or the Mortgagee's local counsel.

11. The Mortgagee's records reflect that the total amount due (including amounts owed both preand post-Petition) on the said mortgage contract is computed as follows:

a.	Unpaid principal:	\$118,864.31
b.	Accrued Interest:	\$9,932.57
c.	Unpaid Late Charges from, D/Default:	\$79.23
d.	Recoverable Balance:	\$2,932.09
e.	Escrow Advances: including Taxes, Insurance premiums, periodic post-default property inspections	\$7,789.48
f.	Pro Rata MIP/PMI	\$75.51
g.	Per Diem interest:	\$0.00
h.	Any other charges:	\$41.25
i.	Suspense/Unapplied Funds balance	\$0.00

Total Due: \$139,714.44

The foregoing calculations do not constitute a demand for immediate payment and certain items may also be included in calculations of the alleged post-Petition default and/or in the filed Proof of Claim. The foregoing calculations are included herein pursuant to Local Rule 3 for the Court's information as applicable. The foregoing calculations constitute the amounts due on the mortgage contract as of the date hereof on the hypothetical assumptions that no Bankruptcy Petition has been filed and that no Judgment in foreclosure has been entered. Questions regarding or objections to the foregoing calculations may be made to the Mortgagee's local counsel identified at the top of the first page of this Certification or to the Mortgagee directly.

-4-Pluese, Becker & Saltzman, LLC

- 12. Trustee payments due inside the plan are current through the payment due <u>N/A</u>.
- 13. As a result of the foregoing, other matters of record, the duration and extent of the Debtors', delinquency, the prejudice and expense already incurred. Movant respectfully requests that any relief from or modification of the Automatic Stay granted herein be immediately effective, pursuant to Federal Rule of Bankruptcy Procedure 4001 (a) (3).

I hereby certify that the foregoing statements are true and correct to the best of my knowledge, information, and belief. I am aware that if any of the foregoing statements are wilfully false, I am subject to punishment.

1st June Miner

DATED: 2/11/21

Pluese, Becker & Saltzman, LLC

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(C)

Rob Saltzman, Esquire

Pluese, Becker & Saltzman, LLC

Attorneys at Law

RS1765

20000 Horizon Way, Suite 900

Mount Laurel, NJ 08054-4318

telephone: (856) 813-1700 telecopier: (856) 813-1720 e-mail:rsaltzman@pbslaw.org Attorneys' for the Mortgagee File No. 104265B

....

In Re:

Jeremy R Askew

Lisa J Burke-Askew

Case No.:20-17570-MBK

Chapter 13

Hearing date: March 10, 2021

Judge: Michael B. Kaplan

## CERTIFICATION RE POST-PETITION PAYMENT HISTORY ON THE NOTE AND MORTGAGE DATED FEBRUARY 05, 2019

_ Gina Winer	of full age, I am an authorized representative of Cenlar FSB,
servicer for the Mortgagee, New Jerse	ey Housing and Mortgage Finance Agency, hereby certifies the
following information:	

## BACKGROUND INFORMATION

- 1. Recorded on March 28, 2019, in Burlington County, in Book OR13380 at Page 9295
- 2. Property Address: 116 8th Ave, Roebling, New Jersey 08554
- 3. Mortgage Holder: New Jersey Housing and Mortgage Finance Agency
- 4. Mortgagor(s)/Debtor(s): Jeremy R Askew and Lisa J Burke-Askew
- 5. Date debtor(s) petition was filed: June 16, 2020
- 6. Post-petition payment address: 425 Phillips Boulevard, Ewing, NJ 08618

## AMOUNT OF POST-PETITION DEFAULT

(As of February 04, 2021)

Amount of debtor(s) monthly mortgage payment: \$1,077.53 Amount of debtor(s) monthly late charge: \$0.00 Total monthly payment including late charge: \$1,077.53

10. Since the petition date, 8 payments should have been made to the mortgagee. Since the petition date no payment(s) have been made, leaving 8 payment(s) in arrears through the payment due February 01, 2021. The total amount of post-petition payment default (monthly payments) is \$8,626.19.

AMOUNT DUE	DATE PAYMENT WAS DUE	HOW PAYMENT WAS APPLIED (MO./YR.)	AMOUNT RECEIVED	DATE PAYMENT RECEIVED	SUSPENSE
1. \$1,078.72	07/01/2020		\$0.00		\$0.00
2. \$1,078.72	08/01/2020		\$0.00		\$0.00
3. \$1,078.72	09/01/2020		\$0.00		\$0.00
4. \$1,078.72	10/01/2020		\$0.00		\$0.00
5. \$1,078.72	11/01/2020	T T T T T	\$0.00		\$0.00
6. \$1,077.53	12/01/2020		\$0.00		\$0.00
7. \$1,077.53	01/01/2021		\$0.00		\$0.00
8. \$1,077.53	02/01/2021		\$0.00		\$0.00

If the monthly payment has changed during the pendency of the case, please explain (attach separate sheet(s) if necessary):

AM	OUNT HELD IN SUSPENSE (if any): \$0.00			
Effe	ective as of December 01, 2020, the current monthly payme	nt is comprised of:		
	Principal & Interest\$660.19	1		
	Escrow Advances\$417.34			
	TOTAL\$1,077.53			
11.	Additional charges and/or advances made post-petition:			
	a) Post-petition bankruptcy fees/costs for within motion:	\$350.00 & \$181.00		
	b) Post-petition advances made for taxes:	\$0.00		
	c) Post-petition advances made for insurance:	\$0.00		
	d) Other fees	\$0.00		

I certify under penalty of perjury that the foregoing is true and correct.

(please specify):

Signature

\$0.00

Pluese, Becker & Saltzman, LLC